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December 9, 2019

The Honorable Pamela K. Chen  
United States District Judge  
United States Courthouse, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Rafael Callejas*, 15-252 (Def. #17) (PKC)(RML)  
Bond Modification – Release of Property**

Dear Judge Chen:

I write to request a modification of the conditions of release imposed upon my client, Mr. Rafael Callejas. The proposed modification is presented to the Court after consultation with government counsel, and is made with their consent.

As the Court is aware, on March 28, 2016, Mr. Callejas entered a guilty plea before the Honorable Robert M. Levy and is now pending sentencing on January 14, 2020. This requested modification would release a property from the bail conditions, and have that property's confession of judgment satisfied so the lien filed against the property may be extinguished. The reason for the modification is submitted in an accompanying sealed filing.

Mr. Callejas asks that the Court authorize the United States Attorney's Office to execute and file or record with the proper local and state authorities such documents as are necessary to eliminate the lien created by the posting of this property, including but not limited to the confession of judgment executed and filed.

Presently, Mr. Callejas' bond stands at \$4,000,000.00, and is secured by \$375,000.00 in cash, real property valued at approximately \$460,000.00, one

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mutual fund valued at approximately \$250,000.00, and seven individuals who co-signed the bond.

In support of his request, Mr. Callejas submits it has been made with the government's consent. Furthermore, Mr. Callejas has fully complied with all conditions of his bond. Wherefore, Mr. Callejas respectfully requests that his bond be modified as set forth above and that all remaining conditions of his bond and release remain in place.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Manuel J. Retureta". The signature is fluid and cursive, with the first name "Manuel" being the most prominent part.

Manuel J. Retureta, Esq.